

## **REMARKS/ARGUMENTS**

Applicant responds herein to the final Office Action mailed May 31, 2006.

Applicant thanks the Examiner for the opportunity of a telephone interview conducted on September 11, 2006. During the interview, applicant's representative pointed out that Jacobs does not disclose or suggest a holding device for securing the semiconductor device to a platform. The Examiner stated that Figures 4 and 5 of applicant's disclosure illustrate the holding device securing the lead frame, and that the claim 1 should clarify this, but agreed that Jacobs does not disclose a holding device for securing the leadframe to a platform. The foregoing will serve as applicant's statement of the substance of the interview.

Claims 1-2 and 6-10 are the claims currently pending in the present application.

Claim 1 is amended to clarify features recited thereby.

Applicant thanks the Examiner for acknowledging acceptance of the formal drawings filed with this application.

### ***Objection under 37 CFR 1.56***

The disclosure is objected to on the ground that a number of co-pending applications are related to the instant application.

Applicant notes that two of the applications cited by the Examiner in the Response to Arguments section, U.S. Patent Application Nos. 10/612,383 and 10/324,643, and an additional application, U.S. Patent Application No. 10/267,143, issued as U.S. Patent No. 6,866,182, relate to the same field as the present application and are cited at the Examiner's suggestion in compliance with 37 C.F.R. § 1.56. However, Applicant respectfully submits that none of applications cited is material to patentability.

### ***Rejection of Claims 1-10 over Jacobs***

Claims 1-10 are rejected under 35 U.S.C. § 102(b) as being anticipated by Jacobs et al., US Patent No. 5,364,007. Reconsideration of this rejection is respectfully requested.

Independent claim 1 requires "a holding device for securing a leadframe for the semiconductor device to a platform."

Jacobs discloses an inert gas delivery system for reflow solder furnaces (Jacobs, Abstract), in which as shown in Fig. 1 of Jacobs, a conveyor belt 24 for moving printed circuit

boards through a heating chamber 14 of a furnace has inert gas lines 58 and 56 situated in a baffle compartment 26 so as to direct a forceful stream of inert gas at the inlet 16 and outlet 18, respectively (Jacobs, col. 9, lines 27-35).

Jacobs does not disclose or suggest a holding device for securing a leadframe, as *inter alia*, required by independent claim 1. The Examiner had alleged that the heating chamber 14 is a holding device (Office Action, page 3). However, the heating chamber does not secure a leadframe, let alone secure the leadframe to a platform as required by claim 1.

Moreover, since Jacobs does not disclose or suggest the holding device for securing the leadframe to a platform, Jacobs is incapable of disclosing or suggesting a holding device that further includes an opening providing access by a bonding tool, as further required by independent claim 1. Accordingly, Jacobs does not disclose or suggest the recitations of independent claim 1.

Claims 2 and 6-10 depend from independent claim 1 and are therefore patentably distinguishable over the cited art for at least the same reasons.

### ***Rejection of Claims 1-10 over Wong***

Claims 1-10 are rejected under 35 U.S.C. § 102(e) as being anticipated by Wong et al., US Patent No. 6,866,182. Reconsideration of this rejection is respectfully requested.

Independent claim 1 requires “a holding device...including an opening providing access by a bonding tool,” and “the holding device further including a cover, the cover defining a hollow cavity connected to the opening.”

Wong discloses element 18, a porous material shown in Figs. 4 and 5 adjacent to the bonding area 10, through which gas is supplied. The Examiner had alleged that the bonding area 10 of Wong corresponds to the hollow cavity.

The Office Action fails to identify specifically the opening included in the holding device that provides access by a bonding tool. Thus, the Examiner appears to have double counted the bonding area 10 of Wong to meet two distinct features recited by claim 1: the opening providing access by a bonding tool that is included in the holding device, and the hollow cavity defined by the cover of the holding device.

In a similar vein, as further clarified by claim 1, the hollow cavity defined by the cover “is located adjacent to the opening” that provides access for the bonding tool. Thus, the hollow

cavity and the opening included in the holding device are two separate features of independent claim 1. Therefore, Wong does not disclose or suggest the recitations of independent claim 1.

Claims 2 and 6-10 depend from claim 1 and are thus patentably distinguishable over the cited art for at least the same reasons.

In view of the foregoing discussion, allowance of the claims of the application is respectfully requested.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on September 29, 2006:

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Date of Signature

Respectfully submitted,

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